

**NYE, PEABODY, STIRLING, HALE  
& MILLER, LLP**

Jonathan D. Miller (CA 220848)

Alison M. Bernal (CA 264629)

Jonathan@nps-law.com

33 West Mission St., Suite 201

Telephone: (805) 963-2345

Facsimile: (805) 563-5385

**CARLSON LYNCH SWEET  
KILPELA & CARPENTER, LLP**

Todd D. Carpenter (CA 234464)

tcarpenter@carlsonlynch.com

1350 Columbia Street, Ste. 603

Telephone: (619) 762-1900

Facsimile: (619) 756-6991

*Attorneys for Plaintiffs and the Class*

*[Additional Counsel Listed on Signature Page]*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MEGAN SCHMITT, DEANA  
REILLY, CAROL ORLOWSKY, and  
STEPHANIE MILLER BRUN,  
individually and on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

YOUNIQUE, LLC,

Defendant.

Case No. 8:17-cv-01397-JVS-JDE

**DECLARATION OF ADAM  
GONNELLI IN SUPPORT OF  
PLAINTIFFS' AMENDED *EX PARTE*  
APPLICATION TO STAY THE CASE  
AND MOTION FOR DISCOVERY  
SANCTIONS**

Complaint Filed: 8/17/17

Trial Date: 2/19/19

**DECLARATION OF ADAM GONNELLI**

I, Adam Gonnelli, declare as follows:

1. I am a partner of the Sultzer Law Group, P.C., counsel for Plaintiffs  
Megan Schmitt, Deana Reilly, Carol Orłowsky, and Stephanie Miller Brun.

DECLARATION OF ADAM GONNELLI IN SUPPORT OF PLAINTIFFS' AMENDED *EX PARTE*  
APPLICATION TO STAY THE CASE AND MOTION FOR DISCOVERY SANCTIONS

2. I make this declaration in support of Plaintiffs' Amended *Ex Parte* Application to Stay the Case and Motion for Discovery Sanctions.

3. Attached hereto as **Exhibit 1** is a true and accurate copy of Plaintiffs' June 4, 2018 Notice of 30(b)(6) Deposition.

4. Attached hereto as **Exhibit 2** is a true and accurate copy of Defendant's July 13, 2018 Objections to Plaintiff's Notice of 30(b)(6) Deposition.

5. Attached hereto as **Exhibit 3** is a true and accurate copy of a Rough Draft of the July 27, 2018 Transcript of Robert Philips.

6. Attached hereto as **Exhibit 4** is a true and accurate copy of Rough Draft of the July 27, 2018 Transcript of Vrena Ranallo.

7. On July 26, 2018, the day before Defendant's 30(b)(6) depositions were held, Defendant identified the designated witnesses for the topics listed in Plaintiff's Notice of 30(b)(6) Deposition: Robert Phillips for topics 1, 5, and 6, and Vrena Ranallo for topics 2, 3, 4, and 7.

8. During the July 27, 2018 deposition of Vrena Ranallo, I notified Defendant's counsel that Defendant's designated 30(b)(6) witness was not adequate and suspended the deposition. *See* Exhibit 4, annexed hereto at 57:9-12.

Dated:

Red Bank, New Jersey  
August 9, 2018

THE SULTZER LAW GROUP P.C.

By: /s/

Adam Gonnelli, Esq.  
280 Highway 35, Suite 304  
Red Bank, NJ 07701  
Tel: (845) 705-9462  
Fax: (888) 749-7747  
gonnellia@thesultzerlawgroup.com

-2-